

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND

UNITED STATES

v.

ROBERT SAUNDERS

Defendant

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Case No. JRR-19-0037

MOTION FOR DISCOVERY

Comes now Robert Saunders, the Defendant, by and through Andrew R. Szekely, Assistant Federal Public Defender, and hereby moves this Honorable Court, pursuant to Fed.R.Crim.P. 32.1(b)(2)(B) and *Brady v. Maryland*, 373 U.S. 83 (1963), for an order directing the United States Probation Office to produce those portions of its file that relate to the alleged violations of supervised release currently pending against Mr. Saunders and any information in the file that could exculpate Mr. Saunders in connection to these allegations. In support thereof he states the following.

1. In a Petition on Supervised Release, the United States Probation Office has alleged six violations of supervised release. These violations allege that:
 - a. Mr. Saunders failed to report to his probation officer on February 10, 2025, and April 21, 2025.
 - b. Mr. Saunders had two positive urinalyses on October 11, 2024, and March 7, 2025.
 - c. Mr. Saunders failed to attend a substance abuse assessment on October 21, November 27, and December 13, 2024.
 - d. Mr. Saunders failed to attend a mental health assessment on October 21, November 27, and December 13, 2024.
 - e. Mr. Saunders failed to enroll in an educational services program.

- f. Mr. Saunders failed to enroll in a vocational services program.
2. There are potentially numerous disputed factual matters related to these allegations. The Court has set a hearing on the petition for October 15, 2025.
3. Pursuant to Federal Rule of Criminal Procedure 32.1(b)(2)(B), the defendant is entitled to disclosure of the evidence against him. Presumably, the files of Mr. Saunders' supervising probation officer contain materials relevant to the alleged violations. Such materials are subject to disclosure under Rule 32.1(b)(2)(B).
4. To the extent there are other materials related to these allegations, inculpatory or exculpatory, in the possession of the Probation Office or the government, Mr. Saunders requests they be produced to him.
5. Accordingly, defense counsel is requesting copies of all records, notes, correspondence, memoranda, reports, and other documents relating to the pending allegations of violations of Mr. Saunders supervised release.
6. It is the understanding of undersigned counsel that the policies of the U.S. Probation Office prohibit disclosure of its files without a Court Order authorizing such disclosure.

For the foregoing reasons, Mr. Saunders respectfully requests that this Court issue an Order requiring the U.S. Probation Office and the government to produce copies of documents, both inculpatory and exculpatory, relating to the alleged violations to undersigned counsel in advance of the violation hearing.

Respectfully submitted,
James Wyda
Federal Public Defender
for the District of Maryland

____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2025, a copy of the foregoing was served via CM/ECF to the government and a copy of the foregoing was sent via email to United States Probation Officer Katelyn Shull.

_____/s/_____
Andrew Szekely